

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LIFE AFTER HATE, INC., a/k/a EXITUSA,	)	
	)	
Plaintiff,	)	Case No. 18-cv-06967
	)	
v.	)	Judge Virginia M. Kendall
	)	
FREE RADICALS PROJECT INC., and	)	Magistrate Judge Jeffrey Cole
CHRISTIAN PICCIOLINI,	)	
	)	
Defendants.	)	

**DEFENDANT CHRISTIAN PICCIOLINI'S SUPPLEMENTAL  
AND AMENDED OBJECTIONS AND ANSWERS TO  
PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION**

Defendant CHRISTIAN PICCIOLINI ("Picciolini"), by and through his undersigned counsel, for his supplemental and amended objections and answers to Plaintiff's First Set of Requests for Admission, states as follows.

1. Admit that you were one of the Co-Founders of Life After Hate, Inc.

**ANSWER:** Admitted.

2. Admit that from August of 2011 to November of 2012, you were Director of Life After Hate, Inc.

**ANSWER:** Denied.

3. Admit that from November of 2012 to the Spring of 2015, you were Executive Board Chair of Life After Hate, Inc.

**ANSWER:** Denied.

4. Admit that from Spring 2015 to April of 2017, you were Board Chair of Life After Hate, Inc.

**ANSWER:** Denied.

5. Admit that from April of 2017 until August of 2017, you were Program Director of Life After Hate, Inc.'s "ExitUSA" program.

**ANSWER:** Denied. Picciolini was program director from time ExitUSA concept began.

6. Admit that while you were a part of and officer for Life After Hate, Inc., the organization provided educational services related to helping individuals leave hate groups and organizations.

**ANSWER:** Picciolini objects to Request 6 as overbroad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and is therefore not reasonably calculated to lead to the discovery of admissible evidence. Picciolini further objects to Request 6 as vague and ambiguous on the grounds that the terms "part of" and "officer" are undefined and Picciolini cannot ascertain the meaning Plaintiff attaches to them. Subject to and without waiving the foregoing objections, and as limited thereby: Admitted. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

7. Admit that while you were part of and officer for Life After Hate, Inc, the organization provided social services related to helping individuals leave hate groups.

**ANSWER:** Picciolini objects to Request 7 as overbroad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and is therefore not reasonably calculated to lead to the discovery of admissible evidence. Picciolini further objects to Request 7 as vague and ambiguous on the grounds that the terms "part of" and "officer" are undefined and Picciolini cannot ascertain the meaning Plaintiff attaches to them. Subject to and without waiving the foregoing objections, and as limited

thereby: Admitted. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

8. Admit that that while you were a part of and officer for Life After Hate, Inc., the organization provided counseling and intervention services, community outreach services, training services, educational and public speaking services, and research services.

**ANSWER:** Picciolini objects to Request 8 as overbroad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and is therefore not reasonably calculated to lead to the discovery of admissible evidence. Picciolini further objects to Request 8 as vague and ambiguous on the grounds that the terms “part of” and “officer” are undefined and Picciolini cannot ascertain the meaning Plaintiff attaches to them. Subject to and without waiving the foregoing objections, and as limited thereby: Admitted. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

9. Admit that Life After Hate, Inc. currently provides educational and social services related to helping individuals leave hate groups and organizations.

**ANSWER:** Denied.

10. Admit that Life After Hate, Inc. is headquartered in Chicago, Illinois.

**ANSWER:** Picciolini lacks knowledge to admit or deny Request 10. Picciolini made a reasonable inquiry and the information he knows or can readily obtain is insufficient to enable him to admit or deny Request 10 because Picciolini has not been involved with Life After Hate, Inc. since on or about August, 2017, and he is therefore unaware as to any location Life After Hate, Inc. currently claims to be its headquarters.

11. Admit that while you were a part of and officer for Life After Hate, Inc., the organization provided services nationwide, including services to Northeastern Illinois, Indiana, California, and Florida.

**ANSWER:** Picciolini objects to Request 11 as overbroad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and is therefore not reasonably calculated to lead to the discovery of admissible evidence. Picciolini further objects to Request 11 as vague and ambiguous on the grounds that the terms “part of” and “officer” are undefined and Picciolini cannot ascertain the meaning Plaintiff attaches to them. Subject to and without waiving the foregoing objections, and as limited thereby: Admitted. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

12. Admit that Tony McAleer came up with the name “ExitUSA” after attending an “Exit” conference in London in early 2014.

**ANSWER:** Denied.

13. Admit that when Tony McAleer came back from his Europe trips in 2014, he and others at Life After Hate, Inc. began referring to Life After Hate, Inc.’s outreach program as “ExitUSA.”

**ANSWER:** Denied.

14. Admit that in 2014 Tony McAleer and Angela King originally developed the ExitUSA program for Life After Hate, Inc.

**ANSWER:** Denied.

15. Admit that, outside of referring a handful of research candidates, you were not involved in the 2014 research project with the National Institute of Justice, which developed an assessment tool.

**ANSWER:** Denied.

16. Admit that Life After Hate, Inc. paid for the creation and post-production of all of the videos you made while you were part of the organization.

**ANSWER:** Picciolini objects to Request 16 on the grounds that it requests for admission information outside the scope of Rule 26(b)(1) and that the information is not relevant to the subject matter of this lawsuit, including any claim or defense asserted in this lawsuit. Subject to and without waiving the foregoing objections, and as limited thereby: Denied. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

17. Admit that videos you made while at Life After Hate, Inc. in 2016 were made for Life After Hate, Inc. and Institute for Strategic Dialogue.

**ANSWER:** Picciolini objects to Request 17 on the grounds that it requests for admission information outside the scope of Rule 26(b)(1) and that the information is not relevant to the subject matter of this lawsuit, including any claim or defense asserted in this lawsuit. Subject to and without waiving the foregoing objections, and as limited thereby: Denied. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

18. Admit that Life After Hate, Inc.'s current logos for LIFE AFTER HATE and EXITUSA were developed by GravityTank for Life After Hate, Inc.

**ANSWER:** Denied.

19. Admit that Life After Hate, Inc. provided educational and social services under the mark “ExitUSA” in 2014.

**ANSWER:** Admitted.

20. Admit that you facilitated the purchase of the domain name <www.exitusa.org> in 2014 while you were Executive Board Chair of Life After Hate, Inc.

**ANSWER:** Picciolini admits that he purchased the domain name exitusa.org, but further answers that he did so in his personal capacity.

21. Admit that Life After Hate, Inc. paid for the <www.exitusa.org> domain name with a \$500 cashier’s check that it made out to the domain name holder and sent to the domain name owner.

**ANSWER:** Denied.

22. Admit that after Life After Hate, Inc. purchased the <www.exitusa.org> domain name, it was transferred to Life After Hate, Inc.’s GoDaddy account.

**ANSWER:** Denied.

23. Admit that in April of 2017, you resigned from Life After Hate, Inc.’s Board.

**ANSWER:** Admitted, but Picciolini further answers that Plaintiff and certain of its Board members forced, coerced, pressured, and deceived Picciolini into tendering his resignation.

24. Admit that prior to you resigning from Life After Hate, Inc.’s Board, you demanded multiple times that Life After Hate, Inc. allow you to leave the organization with the ExitUSA program.

**ANSWER:** Denied.

25. Admit that Life After Hate, Inc. refused to allow you to leave the organization with the ExitUSA program.

**ANSWER:** Denied.

26. Admit that when you resigned Life After Hate, Inc.'s Board in April of 2017, you were made Program Director of Life After Hate, Inc.'s "ExitUSA" program under the supervision of Sam Rangel, who had formal counseling services training.

**ANSWER:** Picciolini admits that for a period of time while he was associated with Life After Hate, Inc., he oversaw ExitUSA operations. Picciolini denies the remainder of Request 26.

27. Admit that you did not share complete information with Sam Rangel concerning who you were providing services to under the ExitUSA program between April of 2017 and August of 2017.

**ANSWER:** Denied.

28. Admit that Sam Rangel sent you multiple warning letters concerning your conduct as Program Director of Life After Hate, Inc.'s ExitUSA program.

**ANSWER:** Picciolini admits that Sam Rangel and Life After Hate, Inc. falsified certain unsubstantiated claims relating to Picciolini while Picciolini was associated with Life After Hate, Inc. and that Rangel communicated the falsified, unsubstantiated claims to Picciolini via letter. Picciolini denies the remainder of Request 28.

29. Admit that Life After Hate, Inc. suspended you as Program Director of ExitUSA in 2017.

**ANSWER:** Denied.



30. Admit that by the end of August of 2017, you were terminated from your position as Program Director of ExitUSA and were no longer a part of Life After Hate, Inc.

**ANSWER:** Picciolini admits he terminated his association with Life After Hate, Inc. in August, 2017. Picciolini denies the remainder of Request 30.

31. Admit that between August of 2017 and May of 2018, you used the term “ExitUSA” to signify the source of the educational services you provided, including training services and speaking services.

**ANSWER:** Denied.

32. Admit that between August of 2017 and May of 2018, you used the term “ExitUSA” to signify the source of social services you provided, including intervention services, counseling services, and social outreach services.

**ANSWER:** Denied.

33. Admit that between August of 2017 and May of 2018, you used the term “ExitUSA” on your website (www.christianpicciolini.com) to signify the source of educational services you provided.

**ANSWER:** Denied.

34. Admit that between August of 2017 and May of 2018, you held yourself out as personally providing the same or similar educational and social services that you had provided while you were a part of Life After Hate, Inc.

**ANSWER:** Denied.

35. Admit that you knew Life After Hate, Inc. owned a federal trademark registration for “Life After Hate” in August of 2017.

**ANSWER:** Denied.

36. Admit that you knew your attorneys received a cease and desist letter from Life After Hate, Inc.'s counsel in November of 2017.

**ANSWER:** Admitted. Picciolini had already sent a cease and desist letter to Plaintiff and the letter from November of 2017 was a response to Picciolini's cease and desist letter.

37. Admit that you are not licensed to provide counseling services.

**ANSWER:** Picciolini object to Request 37 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

38. Admit that you have no degree in counseling services or social work.

**ANSWER:** Picciolini object to Request 38 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

39. Admit that while you were an officer of Life After Hate, Inc., you transferred the <www.exitusa.org> domain name from Life After Hate, Inc.'s GoDaddy account to your personal account on Google domains.

**ANSWER:** Denied.

40. Admit that multiple people in the Life After Hate, Inc. organization demanded that you relinquish control of and to the <www.exitusa.org> domain name while you were a part of Life After Hate, Inc.

**ANSWER:** Picciolini objects to Request 40 as vague and ambiguous on the grounds that he cannot ascertain whom Plaintiff is referring to by the phrase “multiple people in the Life After Hate, Inc. organization.” Subject to and without waiving the foregoing objection, and as limited thereby, Picciolini admits that only Sammy Rangel, albeit wrongfully, demanded that Picciolini transfer all rights and title to exitusa.org to Plaintiff.

41. Admit that multiple people in the Life After Hate, Inc. organization demanded that you relinquish control of and to the www.exitusa.org domain name after you were no longer affiliated with Life After Hate, Inc.

**ANSWER:** Denied.

42. Admit that you promised certain people in the Life After Hate, Inc. organization that you would return control of the www.exitusa.org domain to Life After Hate, Inc. after you resigned from Life After Hate, Inc.’s Board in April of 2017.

**ANSWER:** Denied.

43. Admit that sometime before November of 2017, you caused the <www.exitusa.org> domain name to redirect to <www.christianpicciolini.com>.

**ANSWER:** Admitted.

44. Admit that sometime after May of 2018, you caused the <www.exitusa.org> domain name to redirect to <www.freeradicalsproject.com>.

**ANSWER:** Admitted.

45. Admit that Free Radicals Project Inc. provides services in the same areas as Life After Hate, Inc.

**ANSWER:** Denied.

46. Admit that while working for Free Radical Project Inc., you have provided services to the same or similar people that you provided services to while working at Life After Hate, Inc.

**ANSWER:** Picciolini object to Request 46 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

47. Admit that persons who used to volunteer for Life After Hate, Inc. now volunteer or work for Free Radicals Project Inc.

**ANSWER:** Picciolini object to Request 47 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

48. Admit that approximately fifteen people in Life After Hate Inc.'s Facebook support group left it to join your or Free Radicals Project Inc.'s support group.

**ANSWER:** Picciolini object to Request 48 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, and as limited thereby, Picciolini states that he lacks knowledge or information to admit or deny Request 48 because

after making a reasonable inquiry the information he knows or can readily obtain is insufficient to enable him to admit or deny Request 48.

49. Admit you raise money for Free Radicals Project Inc. by donations on its website <www.freeradicalsproject.org>.

**ANSWER:** Picciolini objects to Request 49 on the grounds that it requests for admission information outside the scope of Rule 26(b)(1) and that the information is not relevant to the subject matter of this lawsuit, including any claim or defense asserted in this lawsuit.

50. Admit that you raise money for Free Radicals Project Inc. through paid speaking engagements.

**ANSWER:** Picciolini objects to Request 50 on the grounds that it requests for admission information outside the scope of Rule 26(b)(1) and that the information is not relevant to the subject matter of this lawsuit, including any claim or defense asserted in this lawsuit.

51. Admit that in November of 2017, you contacted Facebook to regain access to Life After Hate, Inc.'s Facebook Page.

**ANSWER:** Denied.

52. Admit that when Facebook restored your access to Life After Hate, Inc.'s Facebook Page, you deleted Tony McAleer, Sammy Rangel, Angela King as an administer [sic] of the Page.

**ANSWER:** Denied.

53. Admit that you deactivated Life After Hate's Facebook Page the day before Giving Tuesday in November 2017.

**ANSWER:** Denied.

54. Admit that you register[sic] the Twitter handle “@ExitUSATeam” after you were no longer a part of Life After Hate, Inc.

**ANSWER:** Denied.

55. Admit that sometime after May of 2018, you changed the name of the @ExitUSATeam Twitter handle to read “ExitUSA (now @FreeRacialsOrg)” on the Homepage.

**ANSWER:** Admitted.

56. Admit that the Twitter handle @ExitUSATeam still reads ExitUSA (now @FreeRacialsOrg)” on the Homepage.

**ANSWER:** Denied.

57. Admit that you still have administrative control over Life After Hate, Inc.’s YouTube channels.

**ANSWER:** Denied.

Date: February 10, 2019

Respectfully submitted,

By: /s/ Eugene J. Geekie

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*Attorneys for Defendants Free Radicals  
Project Inc. and Christian Picciolini*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 10, 2019, I served a copy of the foregoing document on all parties of record via electronic mail.

/s/ Michael A. Jacobson

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LIFE AFTER HATE, INC., a/k/a EXITUSA,	)	
	)	
Plaintiff,	)	Case No. 18-cv-06967
	)	
v.	)	Judge Virginia M. Kendall
	)	
FREE RADICALS PROJECT INC., and	)	Magistrate Judge Jeffrey Cole
CHRISTIAN PICCIOLINI,	)	
	)	
Defendants.	)	

**DEFENDANT FREE RADICALS PROJECT INC.'S SUPPLEMENTAL AND  
AMENDED OBJECTIONS AND ANSWERS TO  
PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION**

Defendant, FREE RADICALS PROJECT INC. ("FRP"), by and through its undersigned counsel, for its supplemental and amended objections and answers to Plaintiff's First Set of Requests for Admission, states as follows.

1. Admit that FRP was incorporated on May 4, 2018.

**ANSWER:** Admitted.

2. Admit that Defendant Christian Picciolini solely founded FRP.

**ANSWER:** Admitted.

3. Admit that Defendant Christian Picciolini has 100% control of FRP.

**ANSWER:** Denied.

4. Admit that FRP is located at 917 West Washington Blvd. Suite 213, Chicago, IL 60607.

**ANSWER:** Denied.

5. Admit that FRP advertises and markets its services in Chicago, Illinois.

**ANSWER:** Denied.



6. Admit that FRP and its officer/agent Christian Picciolini gives paid and unpaid talks and presentations in and around Chicago.

**ANSWER:** FRP objects to Request 6 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, and as limited thereby: Denied. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

7. Admit that FRP provides educational and social services related to helping individuals leave[sic] hate groups and organizations.

**ANSWER:** Admitted.

8. Admit that FRP advertises its educational and social services on its website [www.freeradicalsproject.org](http://www.freeradicalsproject.org).

**ANSWER:** Denied.

9. Admit that FRP accepts donations through its website.

**ANSWER:** Admitted.

10. Admit that individuals contact FRP via email or after viewing FRP's website.

**ANSWER:** FRP objects to Request 10 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, and as limited thereby, FRP admits that individuals do contact FRP via e-mail. FRP denies the remainder of Request 10 on the grounds that it does not have access to information regarding whether individuals contact it

after viewing its website. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

11. Admit that for several months between May and October of 2018, the domain name <www.exitusa.org> redirected to the domain name <www.freeradicals.org>.

**ANSWER:** FRP objects to Request 11 as vague and ambiguous on the grounds that the terms “several months” are undefined and FRP cannot ascertain the meaning Plaintiff attaches to them. Subject to and without waiving the foregoing objections, and as limited thereby: Denied. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

12. Admit that FRP’s Christian Picciolini has controlled the domain name <www.exitusa.org> since at least May of 2018.

**ANSWER:** FRP objects to Request 12 as vague and ambiguous on the grounds that the term “FRP’s Christian Picciolini” and “controlled” are undefined and FRP cannot ascertain the meaning Plaintiff attaches to them. Subject to and without waiving the foregoing objections, and as limited thereby: Denied. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

13. Admit that FRP has used the phrase “Life After Hate” on its website.

**ANSWER:** FRP objects to Request 13 as vague and ambiguous on the grounds that the term “used” is undefined and FRP cannot ascertain the meaning Plaintiff attaches to it. FRP further objects to Request 13 as overly broad and unduly burdensome on the grounds that use of a “phrase” is not relevant to the subject to the subject matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Further responding,

Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

14. Admit that FRP has held itself out as the company formally known as “ExitUSA.”

**ANSWER:** Denied.

15. Admit that FRP has used the term “ExitUSA” on its social media.

**ANSWER:** FRP objects to Request 15 as vague and ambiguous on the grounds that the term “used” is undefined and FRP cannot ascertain the meaning Plaintiff attaches to it. Subject to and without waiving the foregoing objections, and as limited thereby: Denied. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

16. Admit that Christian Picciolini directs every action taken by RFP [sic].

**ANSWER:** FRP objects to Request 16 as vague and ambiguous on the grounds that the term “action” is undefined and FRP cannot ascertain the meaning Plaintiff attaches to it. Subject to and without waiving the foregoing objections and as limited thereby, FRP denies Request 16. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

17.<sup>1</sup>

18. Admit that Christian Picciolini makes every decision for RFP [sic].

**ANSWER:** FRP objects to Request 18 as vague and ambiguous on the grounds that the terms “every decision” are undefined and FRP cannot ascertain the meaning Plaintiff attaches to them. FRP further objects to Request 18 as overly broad and unduly burdensome on the grounds that it requests for admission information that is not relevant to the subject to the subject

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<sup>1</sup> There is no Request 17 in Plaintiff’s Requests for Admission and therefore FRP has maintained the same numbering as set forth in Plaintiff’s Requests for Admission.

matter of this lawsuit and it is therefore not reasonably calculated to lead to the discovery of admissible evidence. Further responding, Christian Picciolini did identify, or was available to identify this information in his deposition of February 8, 2019.

19. Admit that FRP has had full knowledge of Life After Hate, Inc. and the services it provides under its LIFE AFTER HATE and EXITUSA marks since May of 2018.

**ANSWER:** Denied.

20. Admit that since May of 2018, RFP [sic] knew Life After Hate, Inc. owned federal trademark registrations for the marks LIFE AFTER HATE and EXITUSA.

**ANSWER:** Denied. Further responding, FRP denies that LAH owns such marks and states that registration of such marks was obtained due to the fraud of LAH and its Board members.

Date: February 10, 2019

Respectfully submitted,

By: /s/ Eugene J. Geekie  
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Project Inc. and Christian Picciolini*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 10, 2019, I served a copy of the foregoing document on all parties of record via electronic mail.

/s/ Michael A. Jacobson